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September 23, 2021

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions so that Mr. Goetsche will be allowed to accompany Danielle Goetsche, his wife and one of his third-party custodians, to bring their children directly to school on weekday mornings and return directly back to the residence after school drop off. Ms. Goetsche would coordinate with Pretrial Services. The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved a modification to these conditions to allow Mr. Goetsche to travel to and from his attorneys' office in Denver to review discovery in coordination with Pretrial Services (dkt 187).

Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

Hon. Michael A. Hammer

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cc: Andrew Lourie, Esq.
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